

**FOX ROTHSCHILD LLP**

Formed in the Commonwealth of Pennsylvania

By: John C. Atkin, Esq.

Princeton Pike Corporate Center

997 Lenox Drive

Lawrenceville, NJ 08648-2311

Tel: (609) 896-3600

Fax: (609) 896-1469

[jatkin@foxrothschild.com](mailto:jatkin@foxrothschild.com)

*Attorneys for Plaintiff Strike 3 Holdings, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

STRIKE 3 HOLDINGS, LLC,

Civil Case No. 2:18-cv-927-KSH-CLW

Plaintiff,

v.

AARON LARGE,

**NOTICE OF MOTION FOR ENTRY  
OF DEFAULT JUDGMENT**

Defendant.

**TO:** Aaron Large  
10 Plymouth Place  
Roseland, NJ 07068

**PLEASE TAKE NOTICE** that on September 4, 2018, at 9:30 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Strike 3 Holdings, LLC (“Plaintiff”) will appear before the Honorable Katherine S. Hayden, of the United States District Court for the District of New Jersey, at the

Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, to move the Court for the entry of a default judgment against Defendant Aaron Large (“Defendant”), pursuant to Federal Rules of Civil Procedure 55(b)(2), as follows:

1. Entering default judgment against Defendant on Plaintiff’s Amended Complaint [ECF No. 10] on the grounds of Defendant’s failure to plead or otherwise defend this action;
2. Entering a permanent injunction enjoining Defendant from continuing to infringe Plaintiff’s copyrighted works;
3. Entering a permanent injunction requiring Defendant to delete and permanently remove the digital media files relating to Plaintiff’s copyrighted works from each of the computers under Defendant’s possession, custody, or control;
4. Entering a permanent injunction requiring Defendant to delete and permanently remove the infringing copies of Plaintiff’s copyrighted works Defendant has on computers under Defendant’s possession, custody, or control;
5. Entering a judgment against Defendant awarding Plaintiff statutory damages per infringed work, in the amount of \$17,250.00, pursuant to 17 U.S.C. § 504(a) and (c).
6. Entering a judgment against Defendant awarding Plaintiff its reasonable attorneys’ fees and costs, pursuant to 17 U.S.C. § 505, and authorizing Plaintiff’s counsel to submit a declaration of attorneys’ fees and costs within a reasonable time of entry of Default Judgment;
7. Entering a judgment against Defendant awarding Plaintiff post-judgment interest at the current legal rate allowed and accruing, pursuant to 28 U.S.C. § 1961; and
8. Granting such other and further relief as this Court deems just and proper under the circumstances.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion for Default Judgment, Plaintiff will rely upon the accompanying Brief and Certification of John C. Atkin, Esq., submitted herewith; any reply papers in support of this Motion; and oral argument, if any.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 7.1(e), a proposed form of order is also submitted herewith for the Court's consideration.

DATED: August 8, 2018

Respectfully submitted,

**FOX ROTHSCHILD LLP**

*Attorneys for Plaintiff,  
Strike 3 Holdings, LLC*

By: /s/ John C. Atkin, Esq.  
JOHN C. ATKIN